

1 KAMER ZUCKER ABBOTT
Gregory J. Kamer #0270
2 R. Todd Creer #10016
Nicole A. Martin #13423
3 3000 West Charleston Boulevard, Suite 3
Las Vegas, Nevada 89102-1990
4 Tel: (702) 259-8640
Fax: (702) 259-8646
5 gkamer@kzalaw.com
tcreer@kzalaw.com
6 nyoun@kzalaw.com

7 Attorneys for Defendant
Wynn Las Vegas, LLC

8
9 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 QUY NGOC TANG and JOSEPH CESARZ,)
and all persons whose names are set forth in)
11 Exhibit A, individually and on behalf of all others)
similarly situated,)
12)
Plaintiffs,)
13)
vs.)
14)
WYNN LAS VEGAS, LLC,)
15)
Defendant.)
16)

Case No. 2:18-cv-00891-APG-GWF

JOINT STATUS REPORT AND
JOINT STIPULATION AND
REQUEST FOR CONTINUED STAY

(Third Request)

ORDER

17 Pursuant to the Court's June 3, 2019 Order (ECF No. 51), the parties, by and through their
18 respective counsel of record, provide the Court with the following joint status report and hereby
19 jointly stipulate and request that the Court continue to stay the present matter pending the parties'
20 finalization of the resolution of this matter. The parties state the following:

21 1. Plaintiff filed his Complaint (ECF No. 1) on May 16, 2018 and served the same on
22 Defendant on June 21, 2018. Defendant filed its Answer to Plaintiffs' Complaint (ECF No. 26) on
23 July 12, 2018.

24 2. Many of the same parties and counsel are involved in ongoing litigation regarding

1 Defendant's tip-pooling policies in another case pending in the U.S. District Court, Case No. 2:13-
2 CV-109-RCJ-CWH. That proceeded through a mediation provided by the Ninth Circuit Court of
3 Appeals on May 9, 2019.

4 3. During the May 9, 2019 mediation, the parties were able to reach a global resolution
5 in principle of both matters.

6 4. The parties and counsel are engaged in continued efforts to finalize their resolution
7 and to take the necessary steps to execute the same.

8 5. In view of the resolution reached by the parties and the parties' ongoing efforts to
9 finalize the resolution of this and the related matters, it appears a continuation of the stay is
10 warranted here to allow for the settlement to be consummated.

11 6. This stipulation is made in good faith and for the reasons referenced above, and not
12 for purposes of delay or any other improper purpose.

13 7. In view of the foregoing, the parties jointly stipulate and request that the present
14 proceeding be stayed to facilitate the parties' continuing efforts to

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

1 resolve this matter.

2 DATED this 20th day of June, 2019.

3 THIERMAN LAW FIRM

KAMER ZUCKER ABBOTT

4 By: /s/ Joshua D. Buck

By: /s/ Nicole A. Martin

Mark R. Thierman #8285

Gregory J. Kamer #0270

Joshua D. Buck #12187

R. Todd Creer #10016

7287 Lakeside Drive

Nicole A. Martin #13423

Reno, Nevada 89511

3000 W. Charleston Boulevard, Suite 3

Tel: (775) 284-1500

Las Vegas, Nevada 89102-1990

Tel: (702) 259-8640

Leon Greenberg #8094

Fax: (702) 259-8646

Leon Greenberg Professional Corp.

Attorneys for Defendant

2965 South Jones Boulevard, Suite E-3

Las Vegas, Nevada 89146

Tel: (702) 383-6085

Fax: (702) 385-1827

James P. Kemp #6375

Kemp & Kemp, Attorneys at Law

7435 West Azure Drive, Suite 110

Las Vegas, Nevada 89130

Tel: (702) 258-1183

Robin Potter

111 East Wacker Drive, Suite 2600


Chicago, Illinois 60601

(312) 861-1800

Attorneys for Plaintiffs

18 IT IS ORDERED:

19 Dated: June 21, 2019.

20 
UNITED STATES DISTRICT JUDGE